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19 ORACLE USA, INC., et al.,  
20 Plaintiffs,  
21 v.  
22 RIMINI STREET, INC., et al.,  
23 Defendants.

CASE NO. 2:10-cv-00106-LRH-VCF

**DECLARATION OF ERIC D.  
VANDEVELDE IN SUPPORT OF  
RIMINI'S MOTION TO EXCLUDE  
DECLARATION AND OPINIONS OF  
ORACLE'S EXPERT BARBARA  
FREDERIKSEN-CROSS**

1 I, Eric D. Vandevelde, declare as follows:

2 1. I am a partner in the law firm of Gibson, Dunn & Crutcher LLP, and I am one  
3 of the attorneys representing Rimini Street, Inc. in the above-captioned case. I submit this  
4 declaration in support of Rimini's Motion to Exclude Declaration and Opinions of Oracle's  
5 Expert Barbara Frederiksen-Cross. The facts stated in this declaration are based on my personal  
6 knowledge, and if called upon as a witness, I would and could testify competently to them.

7 2. Attached as **Exhibit A** is a true and correct copy of excerpts from the  
8 September 19, 2018 deposition of Oracle's expert, Barbara Frederiksen-Cross, in *Rimini II*.

9 3. Attached as **Exhibit B** is a true and correct copy of excerpts from the Corrected  
10 Post-Injunction Expert Report of Barbara Frederiksen-Cross.

11 4. Attached as **Exhibit C** is a true and correct copy of the Corrected Post-Injunction  
12 Surrebuttal Expert Report of Barbara Frederiksen-Cross.

13 5. Attached as **Exhibit D** is a true and correct copy of excerpts from the June 19,  
14 2020 deposition of Oracle's expert, Barbara Frederiksen-Cross.

15 6. Attached as **Exhibit E** is a true and correct copy of Exhibit 1859 of the June 19,  
16 2020 deposition of Oracle's expert, Barbara Frederiksen-Cross.

17 7. Attached as **Exhibit F** is a true and correct copy of Exhibit 1860 of the June 19,  
18 2020 deposition of Oracle's expert, Barbara Frederiksen-Cross.

19 8. Attached as **Exhibit G** is a true and correct copy of Exhibit 1861 of the June 19,  
20 2020 deposition of Oracle's expert, Barbara Frederiksen-Cross.

21 I declare under penalty of perjury under the laws of the United States of America that  
22 the foregoing is true and correct, and that I executed this Declaration on July 31, 2020, at Los  
23 Angeles, California.

24  
25 \_\_\_\_\_/s/ Eric D. Vandevelde  
26 \_\_\_\_\_Eric D. Vandevelde  
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